

**BURSOR & FISHER, P.A.**  
Neal Deckant (State Bar No. 322946)  
1990 North California Blvd., 9th Floor  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-Mail: ndeckant@bursor.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

Master File No.: 5:22-cv-07557-PCP (VKD)

This document relates to:

**DECLARATION OF NEAL J. DECKANT  
IN SUPPORT OF MOTION TO SEAL**

All Actions

The Honorable P. Casey Pitts  
Courtroom 8, 4th Floor

I Neal J. Deckant declare as follows:

1. I am an attorney at law licensed to practice in the State of California. I am also a member of the bar of this Court and a partner at Bursor & Fisher, P.A., counsel of record for Plaintiffs. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, could and would competently testify thereto under oath.

2. Plaintiffs' concurrently-filed Motion for Voluntary Dismissal of Plaintiff Crystal Craig's Claims with Prejudice Pursuant To Rule 41(A)(2) ("Motion"), and the accompanying Liskow Declaration in support of the Motion ("Liskow Declaration") Motion for Voluntary Dismissal of Crystal Craig ("Motion"), include information Plaintiffs deem "Confidential" under the Protective Order in this action. *See* ECF No. 73. Specifically, portions of the Motion and the Liskow Declaration describe hardships faced by Plaintiff Craig that, if publicly disclosed, "may cause harm to" Plaintiff Craig, and also consist of the types of information that are typically considered private and confidential.

3. Therefore Plaintiffs are filing this motion to seal to comply with their obligations under Local Rule 79-5 and the Protective Order issued in the case.

4. Plaintiffs wish to file the following portions of the following documents under seal:

- Motion:
  - Page 2, lines 4-8
  - Page 7, line 9
- Liskow Declaration:
  - Page 1, lines 12 through 14

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on June 5th, 2025.

/s/ Neal J. Deckant  
Neal J. Deckant